

2/15/05

**MEMORANDUM**

**SUBJECT:** Minutes of 2/9/05 ChemSAC meeting

**TO:** HED=s Chemistry Interest Group

**FROM:** HED=s Chemistry Science Advisory Council

**Attendees:** Tom Bloem, Leung Cheng, William Cutchin, Michael Doherty, William Donovan (Chair and minutes), George Kramer, Rick Loranger, Christine Olinger, Debra Rate, Bernard Schneider, PV Shah, and Bob Tomerlin

**1. Chlorothalonil snap bean to snow pea data translation (George Kramer and Bob Tomerlin).** The ChemSAC was asked to determine if it is acceptable to translate chlorothalonil snap bean data to snow peas to support an import tolerance on snow peas (primarily from Guatemala). The following reasons were offered to support this request:

- 1) The proposed use patterns for the snow peas follows the established label use on snap beans.
- 2) Many of the cultural practices used for crops grown in Guatemala were developed with University and USDA Extension Service researchers.
- 3) The Crop Monograph 446 for edible podded pea (includes snow pea) states that exposure of the edible plant portions of snow peas are similar to the exposure of the edible plant portions of snap beans. So, residues on the plant tissue should be similar. (Reference: Food and Feed Crops of the U.S. 1998. G. Markle, J. Baron, and B. Schneider. MeisterPress.).
- 4) Seeding to harvest snow peas varies from 60 to 75 days for snow peas and from 50 to 90 days for snap beans.
- 5) In Guatemala, snow peas are often grown on trellis or poles similar to pole snap beans.
- 6) The edible portion of both crops is the succulent seed with pod.
- 7) Both crops are susceptible to root rots, mildew, and virus diseases.
- 8) The FDA monitoring data is well below the established tolerance of 5 ppm for bean, snap, succulent. 74 Guatemalan snow pea samples were analyzed from 1998 through 2002. The maximum residue observed was 0.74 ppm, and the mean residue was 0.031 ppm. Both values are well below the 1.8 ppm average field trial value on snap beans used in the risk assessment.

The ChemSAC determined that this translation is acceptable for this case only. Should a US snow pea use be requested, residue data in the US would be required. The similarity in use pattern together with the monitoring data are adequate to support a snow pea tolerance of 5 ppm.

**2. Clethodim on fescue (forage grass) for seed head suppression (Bernie Schneider).** Fred Salzman (IR-4) submitted a reduced data set request for clethodim use on forage grass for seed head suppression. The seed head of tall fescue can be infected with a fungal endophyte, which causes cattle health problems after ingestion. Use of clethodim suppresses seed head production in fescue and removes the largest source of fungal endophyte exposure for cattle. This regional registration will be limited to tall fescue grass in the following states: KS, OK, AR, MO, IL, IN, OH, KY, and TN. Six field trials have been conducted and IR-4 requests that this be considered sufficient to meet the crop field trial data requirement for this use.

The ChemSAC noted that twelve trials throughout the US (no specific regions) is requested by the residue chemistry test guidelines. However, in this case, a reduced data set consisting of six trials is adequate for the following reasons: 1) a regional registration is requested, 2) the use will be limited to tall fescue grass, 3) the six trials already conducted were done over a wide geographical area with fescue and bluegrass, and 4) the forage and hay maximum residue levels are relatively consistent regardless of geographical location and grass variety.

**3. Drip Irrigation/Chemigation policy development (Rick Loranger).** The ChemSAC was asked to address whether residue data are needed for application of pesticides by chemigation or drip irrigation when data are already available for ground applications with typical spray volumes. The crop field trial guideline (860.1500) states that data are not required for chemigation when typical ground application data are available. However, questions have been raised recently as to whether this approach is appropriate for root and tuber crops where the chemigation or drip irrigation techniques might move the pesticide deeper into the soil and therefore closer to the raw agricultural commodity than typical foliar applications. The SAC concluded that data will not be required for the chemigation or irrigation uses at this time as long as the typical ground application data are provided. It was decided that Bernie Schneider will work with Dan Kunkel of IR-4 to determine whether registrants have any data comparing residues in root or tuber crops following typical foliar applications with those resulting from chemigation and/or drip irrigation.